

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, <i>et al.</i>,¹ Debtors.	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Appellant North American Specialty Insurance Company (collectively “NAS”), by and through its undersigned counsel, files this Notice of Appeal pursuant to 28 U.S.C. § 158(a)(1) and Rule 8003 of the Federal Rules of Bankruptcy Procedure.

Appellant appeals to the United States District Court for the Southern District of Texas this Court’s Findings of Fact, Conclusions of Law, and Order Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Dkt. No. 1751], entered on June 25, 2021, (the “Confirmation Order”) to the extent the Confirmation Order, including any findings of fact or conclusions of law therein, purports to eliminate or impair NAS’ rights of subrogation, reimbursement, exoneration with respect to any of the post-confirmation entities, including Newco and Credit Bidders, by failing to recognize or require the assumption or transfer

¹ The Debtors, each of which have filed a separate voluntary petition, are: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

of such obligations related to leases and property interests of the Debtors distributed to the post-confirmation entities.

Part 1: Identification of Appellant

1. Name of Appellant – North American Specialty Insurance Company.
2. Position of Appellant in bankruptcy case – surety for the Debtor, Fieldwood Energy Offshore, LLC.

Part 2: Identification of the Subject of this Appeal

1. The June 25, 2021, Confirmation Order to the extent the Confirmation Order, including any findings of fact or conclusions of law therein, authorizes (a) any assumption by the Debtor(s) and assignment of any leases or, (b) any sale of assets to Credit Bid Purchaser(s), in each case free and clear of Appellant's future subrogation rights, rights of reimbursement, rights of restitution, or existing and future rights of exoneration, pursuant to 11 U.S.C. §§ 363 or 365 or otherwise. The Confirmation Order is attached hereto as **Exhibit A**.

Part 3: Identification of the other Parties to the Appeal

The names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys are as follows:

1. Appellant: North American Specialty Insurance Company

Attorneys for Appellant:

THE LAW OFFICES OF T. SCOTT LEO, P.C.

By: /s/ T. Scott Leo

T. Scott Leo, Esq. (admitted *pro hac vice*)

(sleo@leolawpc.com)

William S. Piper, Esq. (admitted *pro hac vice*)

(wpiper@leolawpc.com)

Ralph J. Kooy, Esq. (admitted *pro hac vice*)

(rkooy@leolawpc.com)

100 N. LaSalle Street, Suite 514

Chicago, Illinois 60602

Telephone: (312) 857-0910

2. Debtors: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

Attorneys for Debtors:

WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez
Clifford W. Carlson
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000

-AND-

WEIL, GOTSHAL & MANGES LLP
Paul Richard Genender
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7877

-AND-

WEIL, GOTSHAL & MANGES LLP
Jason George (admitted *pro hac vice*)
Matthew S. Barr (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
767 Fifth Avenue New York
New York 10153
Telephone: (212) 310-8000

3. Credit Bid Purchaser(s): Mako Buyer, LLC and Mako Buyer 2, LLC

Attorneys for Credit Bid Purchaser(s):

DAVIS POLK & WARDWELL LLP
Damian Schaible
Natasha Tsiouris, Esq.
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Fax: (212) 701-5800

Dated: July 1, 2021

Respectfully submitted,

THE LAW OFFICES OF T. SCOTT LEO, P.C.

By: /s/ T. Scott Leo

T. Scott Leo, Esq. (*admitted pro hac vice*)

(sleo@leolawpc.com)

William S. Piper, Esq. (*admitted pro hac vice*)

(wpiper@leolawpc.com)

Ralph J. Kooy, Esq. (*admitted pro hac vice*)

(rkooy@leolawpc.com)

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Notice of Appeal was served by electronic delivery on all persons and entities receiving ECF notice in this case on July 1, 2021.

/s/T. Scott Leo
T. Scott Leo